

Responses to Comments

on

Draft Final Site Inspection Report

Midland Army Airfield

Midland County, Texas

FUDS Project No. K06TX019901

Note: Parsons responses shown in blue



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Contents

1. Responses to Comments from Gary W. Miller, USEPA on Draft Final Site Inspection Report, dated July 28, 2008;
2. Responses to Comments from Maureen Hatfield, TCEQ, on Draft Final Site Inspection Report, dated July 7, 2008.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

July 28, 2008

Randy Niebuhr
CESWF-PM-J
P.O. Box 17300
Fort Worth, Texas 76102-0300

Dear Mr. Niebuhr:

I have completed my review of the document entitled, *Draft-Final Site Inspection Report, Midland Army Airfield, Midland County, Texas, dated June 2008*. This document was received by EPA on June 25, 2008.

Please note the following comment is being provided to you as an interim response in order to meet your requested review times. This document will also be provided to our Superfund Site Assessment Section and a joint response will be generated with our final comments on the report.

- I do not agree with the decision to not carry munitions constituents (MC) evaluation through to the remedial investigation/feasibility study (RI/FS). This was a limited investigation of surface soils at the site and EPA never agreed that the sampling would be used to discontinue the evaluation of constituents of concern. However, we would mainly be concerned with the evaluation of MC if areas are found during the RI/FS that contain a large number of munitions debris items or munitions and explosives of concern.
- In addition based upon the surface soil analysis the report states no further evaluation of MC or PAHs is warranted at the Skeet Range. However, because of planned construction the area is recommended for RI/FS. The only reason I can see for a concern with new construction would be a treat from MC or PAHs in disturbed soils.

If you have any questions, please contact me at 214-665-8306.

A handwritten signature in black ink, which appears to read "G. W. Miller", is positioned above the typed name and title.

Gary W. Miller
Senior Project Manager,
Federal Facilities Section

cc: Maureen Hatfield, TCEQ

Response to USEPA Comments

USEPA Comments (submitted July 28, 2008):

1. I do not agree with the decision to not carry munitions constituents (MC) evaluation through to the remedial investigation/feasibility study (RI/FS). This was a limited investigation of surface soils at the site and EPA never agreed that the sampling would be used to discontinue the evaluation of constituents of concern. However, we would mainly be concerned with the evaluation of MC if areas are found during the RI/FS that contain a large number of munitions debris items and explosives of concern.

Response: Comment noted. Additional MC analysis has been recommended at depth for the Burial Pit MRSs and further PAH analysis has been recommended for the Skeet Range MRS.

2. In addition based upon the surface soil analysis the report states no further evaluation of MC or PAHs is warranted at the Skeet Range. However, because of planned construction the area is recommended for RI/FS. The only reason I can see for a concern with new construction would be a threat from MC or PAHs in disturbed soils.

Response: Due to the limited sampling in the Skeet Range and the detection of PAHs in soil, additional MC analysis will be recommended in the Final Report.

Buddy Garcia, *Chairman*
Larry R. Soward, *Commissioner*
Bryan W. Shaw, Ph.D., *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 7, 2008

Mr. Randy Niebuhr
Fort Worth District, Corps of Engineers
CESWF-PM-J
P.O. Box 17300
819 Taylor Street, Room 3A28
Fort Worth, Texas 76102-0300

Re: Texas Commission on Environmental Quality (TCEQ) Additional Comments on *Draft Final Site Investigation Report Midland Army Airfield Target Range No. 14*, Midland County, Dated June 27, 2008; Midland Army Airfield (AAF) Target Ranges, FUDS MMRP Sites, Texas
TCEQ ID No. T2085

Dear Mr. Niebuhr:

The TCEQ, Remediation Division has completed review of the above referenced document received by the Remediation Division on June 30, 2008. Based on our review the TCEQ has the following comments regarding Target Range No. 14:

1. TCEQ strongly recommends that the U.S. Corps of Engineers (USCOE) should take immediate action to place warning signs at the primary access points to this site indicating historic use of the site as a bombing target range. This recommendation is based on the following:
 - a.) The land is no longer under Dept. of Defense control and current and future land use includes oil and gas production.
 - b.) The Site Investigation (SI) report concludes that based on the type of munitions debris present, high explosives (HE) in addition to practice bombs w/spotting charges may be present.
 - c.) The SI report concludes there is some potential for human receptors to come into contact with surface and subsurface Munitions and Explosives of Concern (MEC) that may still be present at the Bombing Rang Munitions Response Site (MRS). Also, the MEC risk assessment concluded there is some potential for an explosive safety risk at this MRS, it will likely be at least ten to fifteen years, at the minimum, before the remedial investigation/feasibility study (RI/FS) project phase will commence.
2. Based on the sample analyses, the USCOE recommends no further evaluation of munitions constituents (MC) sampling at the Bombing Target for this site during the RI/FS phase. The USCOE based this recommendation on the lack of detection of explosives constituents, and no exceedance of metals above background or metal concentrations were not detected above human health screening levels. The TCEQ does not agree with the USCOE's recommendation, because multi-incremental (MI) sampling approach was not used at this site, and I do not believe the sampling design, and the number of samples is adequate to make such a determination. The TCEQ would likely have reconsidered the recommendation, if MI approach was utilized, the sampling included the firing points and impact areas, and no MC was found.

Mr. Randy Niebuhr

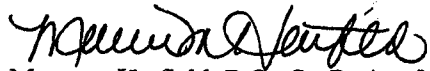
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July 7, 2008

TCEQ Facility ID No. T2085

Questions concerning this letter should be directed to me at (512) 239-2034, or contact me via e-mail: mhatfiel@tceq.state.tx.us. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127 with an additional copy submitted to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

Sincerely,



Maureen Hatfield, P.G., Sr. Project Manager
Technical Support Section
Remediation Division
Texas Commission on Environmental Quality

MH/ok

cc: Gary W. Miller, P.E., Senior Project Manager, Federal Facilities Section, U.S. EPA Region 6,
1445 Ross Ave., 6PD-F, Dallas, TX 75202-2733
Waste Program Manager, TCEQ Region 7 Office, Midland

Response to TCEQ Comments

TCEQ Comments (submitted to Randy Niebuhr of USACE on July 7, 2008)

1. TCEQ strongly recommends that the U.S. Corps of Engineers should take immediate action to place warning signs at the primary access points to this site indicating historic use of the site as a bombing target range. This recommendation is based on the following:
 - a. The land is no longer under Dept. of Defense control and current and future land use includes oil and gas production.
 - b. The Site Investigation (SI) report concludes that based on the type of munitions debris present, high explosives (HE) in addition to practice bombs w/spotting charges may be present.
 - c. The SI report concludes there is some potential for human receptors to come into contact with surface and subsurface MEC that may still be present at the Bombing Range MRS. Also, the MEC risk assessment concluded there is some potential for an explosive safety risk at this MRS, it will likely be at least ten to fifteen years, at the minimum, before the RI/FS project phase will commence.

Response: These types of public education efforts are response actions that are not typically implemented until a Remedial Investigation/Feasibility Study has been conducted, at which point sufficient justification is available to secure funding for the appropriate response action.

However, as discussed at a TPP Meeting on June 19, 2008 for other area Midland Target Range sites, USACE has taken note of this comment.

2. Based on the sample analyses, the Corps of Engineers (COE) recommends no further evaluation of munitions constituents (MC) sampling at the Bombing Target for this site during the RI/FS phase. The USCOE based this recommendation on the lack of detection of explosives constituents, and no exceedance of metals above background or metal concentrations were not detected above human health screening levels. The TCEQ does not agree with the COE's recommendation, because Multi-incremental sampling approach was not used at this site, and the sampling design and number of samples was not adequate to make such a determination. The TCEQ would likely have reconsidered the recommendation if the MI approach was utilized, the sampling included the firing points and impact areas, and no MC was found.

Response: It is noted that the TCEQ prefers the MI sampling technique, which will be used in future SIs. However, at Midland AAF, further MC sampling is recommended at depth for both Burial Pit MRSs, and further PAH sampling is recommended for the Skeet Range.

Edwards, Lydia

From: Burdey, Julie
Sent: Tuesday, August 12, 2008 3:48 PM
To: Sokolic, Kathy; Galbavy, Edward; Kirk, Justin
Subject: RE: July 3rd and 7th Range 14 comments

fyi...

From: Niebuhr, Randy R SWF [mailto:Randy.R.Niebuhr@usace.army.mil]
Sent: Tue 8/12/2008 3:36 PM
To: Burdey, Julie
Subject: FW: July 3rd and 7th Range 14 comments

Answer for missing comments from TCEQ. I have attached the 3rd and 7th comments. I sent an e-mail to Wendy Jacques about comments for Range 10.

From: Maureen Hatfield [mailto:MHATFIEL@tceq.state.tx.us]
Sent: Tuesday, August 12, 2008 2:55 PM
To: Niebuhr, Randy R SWF
Subject: Re: July 3rd and 7th Range 14 comments

Randy:

The July 7th comment letter is for both Midland Army Airfield and TR-10 draft final reports, and the July 3rd letter is for TR-14 draft final report.

>>> "Niebuhr, Randy R SWF" <Randy.R.Niebuhr@usace.army.mil> 8/12/2008 1:58 PM >>>
Maureen, I have two separate sets of comments for Range 14. One dated 3 July 08 and another dated 7 July 08. Was one set of comments suppose to be for Range 10?